

LAW OFFICE OF ROBERT FEITEL, P.L.L.C.
1300 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20008
202-450-6133 (office)
202-255-6637 (cell)
RF@RFeitelLaw.com

December 7, 2020

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
Manhattan, New York

Re: *United States v Ronald Salguero Portillo*, S5 15 Cr. 379

Dear Judge Castel,

I am writing to respectfully request that the Court continue the in person status hearing in this case, currently scheduled for December 16, 2020. As the result of Chief Judge McMahon's *Standing Order* of November 30, 2020, there will be no "in person" court proceedings until January 15, 2021. After consultation with my client, we believe that it would be prudent to continue the status hearing for approximately forty-five (45) days, until approximately the end of January 2021. Undersigned has communicated with the prosecutors assigned to this case, who do not object to the proposed continuance.

In support of this request, the defense notes that the corona-virus pandemic has seriously limited defense counsel's ability to consult with his client. The parties are still in discussion as to the resolution of this case and undersigned is requesting additional discovery from the Government. I have spoken with Mr. Salguero about his speedy trial rights and he agrees to waive the time for calculation of speedy trial until the next scheduled status hearing.

For all of these reasons, the defense respectfully requests that this continue the currently scheduled status hearing.

Respectfully submitted,

Robert Feitel

Robert Feitel, Esquire
1300 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

202-2550-6637 (cellular)
202-450-633 (office)
RF@RFeitelLaw.com

cc: Daniel Nessim, AUSA via ECF and email
Kyle Wirsbah, AUSA via ECF and email